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FEDERAL COMMUNICATIONS COMMISSION

October 13, 1994

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Subject: Equal Access and Interconnection Obligations
Pertaining to Commercial Mobile Radio Services,
CC Docket No. 94-54, RM 8012

Dear Mr. Caton:

Enclosed please find the original and nine copies of the General Services Administration's Reply Comments for filing on the above-referenced proceeding. Copies of this filing have been served on all interested parties.

Sincerely,

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Enclosures

cc: International Transcription Service

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BEFORE THE
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WASHINGTON, D.C.

In the Matter of
Equal Access and Interconnection
Obligations Pertaining to
Commercial Mobile Radio Services

CC Docket No. 94-54
RM-8012

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

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October 13, 1994

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

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REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

SUMMARY

In these Reply Comments, GSA responds to the comments and proposals of more than fifty parties. The voluminous record in this proceeding is indicative of the growing importance of CMRS.

This extensive record fully supports the imposition of equal access obligations on all CMRS providers. The uniform provision of equal access will promote regulatory parity and competition in both the interexchange and CMRS industries to the ultimate benefit of all end users.

The record also supports the uniform filing of interconnection tariffs by both local exchange carriers and CMRS providers. Such filings will ensure that interconnection rates, terms and conditions are reasonable and that carriers do not engage in unreasonable discrimination.

Finally, the record demonstrates that virtually all parties support the prohibition of restrictions on the resale of CMRS.

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CC Docket No. 94-54
RM-8012

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

The General Services Administration ("GSA"), on behalf of the Federal Executive Agencies, hereby submits its Reply Comments in response to the Commission's Notice of Proposed Rulemaking and Notice of Inquiry ("Notice"), FCC 94-145, released July 1, 1994. This Notice requested comments and replies on various issues related to Commercial Mobile Radio Services ("CMRS").

I. Introduction

In Comments filed on August 30, 1994, GSA supported the imposition of equal access and interconnection obligations on CMRS providers.¹ GSA also recommended that the Commission prohibit restrictions on the resale of CMRS services, and require local exchange carriers ("LECs") to provide interconnection arrangements

¹Comments of GSA, pp. 2-4 and 6-7.

to CMRS providers under tariff.²

GSA noted that CMRS is becoming a critical component of local exchange access and could no longer be seen as merely discretionary.³ GSA emphasized that it is critical that the Commission establish appropriate rules for this growing and diversified industry.⁴

The importance of CMRS and the significance of the issues under consideration in this proceeding are apparent in the 1500 pages of comments filed in response to the Notice. Comments were filed by:

- 38 individual CMRS providers and 4 CMRS industry associations;
- 10 individual LECs and 2 LEC associations;
- 4 interexchange carriers ("IXCs");
- the National Association of Regulatory Utility Commissioners ("NARUC") and 2 state commissions;
- Rand McNally & Company ("RMC") and E.F. Johnson Company.

In these Reply Comments, GSA will respond to the comments and proposals made by these parties.

²Id., pp. 4-6 and 7.

³Id., p. 2.

⁴Id.

II. The Commission Should Impose Equal Access Obligations Upon CMRS Providers.

In its Comments, GSA supported the imposition of equal access obligations on all CMRS providers holding radio licenses and passing telecommunications traffic to the IXCs.⁵ GSA argued that the provision of equal access would promote competition in both industries to the ultimate benefit of all end users. GSA also noted that a uniform equal access requirement would create regulatory parity between all similarly situated CMRS providers. GSA recommended that a schedule be established which would allow the phase-in of equal access balloting and presubscription by all CMRS providers.

The imposition of equal access requirements was opposed by virtually all CMRS providers not already subject to them. CMRS providers already subject to equal access requirements supported their imposition on all other CMRS providers in order to ensure regulatory parity.⁶ Symmetrical equal access requirements were also strongly supported by the IXCs⁷ and state regulators.⁸

⁵Comments of GSA, pp. 2-4.

⁶See, e.g., Comments of Ameritech, pp. 1-2; BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Cellular Corp. ("BellSouth"), pp. 27-41; Southwestern Bell Corporation ("SBC"), pp. 45-47.

⁷See, e.g., Comments of AT&T Corp. ("AT&T"), pp. 3-11; MCI Telecommunications Corporation ("MCI"), pp. 2-11; Allnet Communications Services, Inc. ("Allnet"), pp. 2-7.

⁸See Comments of NARUC, p. 2; the New York State Department of Public Service ("New York"), pp. 2-4; the People of the State of California and the Public Utilities Commission of the State of California ("California"), pp. 2-3.

The opponents of equal access based their opposition on four general points. First, equal access requirements are unnecessary since they were developed to control monopoly powers which they do not possess.⁹ Second, the marketplace will ensure equal access.¹⁰ Third, equal access requirements will result in higher end user toll bills.¹¹ And finally, the implementation of equal access will greatly burden CMRS providers.¹² None of these arguments can withstand close scrutiny.

First, while it is true that CMRS providers do not possess as much monopoly power as the LECs, they do possess enough monopoly power to make it difficult for end users to select the IXC of their choice. Currently, there are only two CMRS providers in each market. These providers are in a position to favor one IXC to the exclusion of all others. Even when wide area Specialized Mobile Radio ("SMR") and personal communications service ("PCS") providers become sufficiently established to compete with the cellular carriers, the absence of an equal access requirement may lead to a

⁹See, e.g., Comments of the Cellular Telecommunication Industry Association ("CTIA"), pp. 5-11; ALLTEL Mobile Communications, Inc. ("ALLTEL"), pp. 2-5; OneComm Corporation ("OneComm"), pp. 6-9.

¹⁰See, e.g., Comments of AirTouch Communications ("AirTouch"), pp. 3-6; New Par, pp. 2-5; American Personal Communications ("APC"), pp. 2-4.

¹¹See, e.g., Comments of Vanguard Cellular Systems, Inc. ("Vanguard"), pp. 10-18; Highland Cellular, Inc. ("Highland"), pp. 2-3; Pacific Telecom Cellular, Inc. ("PTC"), pp. 3-5.

¹²See, e.g., Comments of Century Cellunet ("Century"), pp. 4-7; Small Market Cellular Operations ("SMC"), pp. 4-6; Florida Cellular RSA Limited Partnership ("Florida Cellular"), p. 3.

condition where each CMRS provider connects with only one or two IXC's. From the end user's standpoint, the selection of a CMRS provider would carry with it the selection of an IXC. Such tying arrangements would not be conducive to effective competition in either the CMRS or the IXC markets. Competition has been promoted in the interexchange market by the Commission's equal access requirements for LECs. As CMRS providers grow and gain in strength, it is essential that their market power not be used to subvert competition in the interexchange market. AT&T states:

The absence of equal access denies consumers the ability to access interexchange carriers of their own choosing, and thus may prevent them from realizing the full value of the interexchange services otherwise available to them in a competitive marketplace.¹³

The contention that competition in the provision of CMRS will result in the voluntary provision of equal access is contradicted by the facts. Virtually all CMRS providers who have never been required to provide equal access do not provide equal access. Nor is there much incentive to do so. Indeed, with cross-ownership arrangements such as the recent acquisition of McCaw by AT&T, there are reasons to believe that many CMRS providers will discriminate among IXC's unless forced to treat them equally. The vocal opposition to equal access by the CMRS providers in this proceeding is clear evidence that they will not provide it voluntarily.

Indeed, many opponents of equal access claim that the toll bills of their end users would increase if they were to provide

¹³Comments of AT&T, p. 7 (footnote deleted).

equal access. This claim is based on their contention that the provision of equal access would prevent them from offering bundled packages of toll services. No party to this proceeding has suggested that CMRS providers would be prevented from buying bulk toll services and offering packages to their customers. At issue is the provision of a choice to their customers of either subscribing to such packages or the IXC of their choice. The customers of these CMRS providers are denied such a choice now, and the Commission should correct this situation.

The final contention of equal access opponents is that its provision would be overly burdensome on them. The facts belie this argument. NYNEX states:

Based on its experience in providing cellular equal access, NYNEX does not believe that the costs of providing equal access for CMRS services will be excessive.¹⁴

Bell Atlantic concurs:

In fact the cost of conversion to equal access is a one-time expense which can often be made with existing equipment. Bell Atlantic has been required to convert the non-wireline cellular systems it has acquired to equal access. It has found that the necessary equipment is readily available and can be installed at reasonable cost.¹⁵

In any case, the transition to CMRS equal access can be phased in as it was for landline services, and its cost passed through to the IXCs. OneComm suggests a three year phase-in period and ten

¹⁴Comments of NYNEX, p. 7.

¹⁵Comments of the Bell Atlantic Companies ("Bell Atlantic"), pp. 10-11.

year cost amortization period, for example.¹⁶ Other parties suggest transitions of from six months to five years.¹⁷ GSA recommends a flexible approach to implementation which would allow a longer period of transition for carriers demonstrating a special hardship. New entrants to the field, of course, would be expected to design equal access into their initial plans.

III. LECs Should Be Required to Provide
Interconnection Arrangements to
CMRS Providers Under Tariff.

In its Comments, GSA urged the Commission to require the LECs to provide CMRS interconnection under tariff.¹⁸ GSA agreed with the Commission that "tariffing is an established method for ensuring that rates, terms and conditions are reasonable and that carriers do not engage in unreasonable discrimination."¹⁹ GSA recommended that the Commission require LEC tariffs to prevent confusion and inequities from arising as new PCS and other CMRS providers enter the market.

Most commenting LECs and many established CMRS providers opposed the establishment of LEC interconnection tariffs.²⁰ In

¹⁶Comments of OneComm, p. 19.

¹⁷See Comments of New Par, p. 8; Western Wireless Corporation ("WWC"), p. 6.

¹⁸Comments of GSA, pp. 4-6.

¹⁹Notice, p. 49.

²⁰See, e.g., Comments of GTE Service Corporation ("GTE"), pp. 37-45; Rochester Telephone Corporation ("Rochester"), pp. 8-9; Cincinnati Bell Telephone Company ("Cincinnati"), pp. 2-3; RAM

general, the opponents of tariffs argued that they were unnecessary and administratively burdensome.

On the other hand, California and New York both reported that they require LECs to file tariffs for intrastate CMRS interconnection. New York stated:

This arrangement serves to keep interconnection arrangements nondiscriminatory and open to inspection. Additionally, it eases interconnection for new market entrants.²¹

California found that "an interconnection tariff will reduce the likelihood that a new entrant into the wireless market will be at a disadvantage when negotiating interconnection arrangements with an LEC."²² California also found that "interconnection tariffs will reduce the opportunity for LECs to favor their affiliates in the wireless market."²³

The validity of these state commission findings is affirmed by the comments of new entrants. Nextel states:

While Nextel has had some efficient experiences, and some difficult experiences, with each approach, there is a generally greater assurance that competing carriers are obtaining comparable interconnection rates, terms and conditions under the tariffing approach.²⁴

Point Communications Company ("Point") states its position more

Mobile Data USA Limited Partnership ("RMD"), pp. 7-8.

²¹Comments of New York, p. 4.

²²Comments of California, p. 3 (footnote deleted).

²³Id. (footnote deleted).

²⁴Comments of Nextel Communications, Inc. ("Nextel"), p. 15.

bluntly:

Regrettably but predictably, the current system of "good faith" negotiations between LECs and cellular carriers over interconnection facilities and rates simply does not work. "Good faith" is reduced to a minimum when one party has no choice but to deal with the other. This is especially true for small carriers who have little bargaining power....Because negotiating does not work for small independent carriers, the Commission should require LECs to file FCC interconnection tariffs.²⁵

GSA urges the Commission to bring consistency to its regulatory policies by requiring the LECs to tariff their CMRS interconnection arrangements in the same manner as they have been required to tariff their expanded interconnection services.

IV. CMRS Providers Should Be Required to Interconnect With Each Other Pursuant to Tariff.

In its Comments, GSA urged the Commission to require CMRS providers to interconnect with each other pursuant to tariff.²⁶ GSA argued that the public interest would best be served, and the government's own competitive procurement responsibilities enhanced, if the Commission encouraged the development of a robust "network of networks", and not a situation where most traffic must pass through a LEC, even when such routing is inefficient.

Most LECs and CMRS providers opposed the imposition of CMRS

²⁵Comments of Point, p. 5 (emphasis added).

²⁶Comments of GSA, pp. 6-7.

interconnection requirements.²⁷ In general, they contended that it is premature to establish such requirements, and that they are unnecessary and burdensome, in any case.

AT&T argues, however, that "CMRS provider interconnection with other CMRS providers would be in the public interest because it would facilitate the use and interaction of a variety of services by customers to make or receive communications."²⁸ Pacific agrees and adds:

Interconnectivity of mobile communications promotes the public interest and makes services more attractive to consumers. One of the goals of the Commission in providing for the regulation of PCS is the universality of service. Interconnection will support this goal by enabling faster access to the service over a wide area.²⁹

GSA does not believe that it is at all premature to address the need for CMRS interconnection. New York notes that "as the number of CMRS providers and services increases, there may be a dramatic increase in the number of calls completed between CMRS providers."³⁰ DCR Communications, Inc. ("DCR") summarizes the situation well:

Things will become much more complicated as more carriers enter the telecommunications

²⁷See, e.g., Comments of Ameritech, p. 4; the Organization for the Protection and Advancement of Small Telephone Companies ("OPASTCO"), pp. 5-6; McCaw Cellular Communications, Inc. ("McCaw"), pp. 5-20.

²⁸Comments of AT&T, p. 13.

²⁹Comments of Pacific Bell and Pacific Bell Mobile Services ("Pacific"), p. 17 (footnote deleted).

³⁰Comments of New York, p. 5

business....Without equal access and interconnection, it may become very difficult to complete a phone call....The answer is to solve the problem now before it becomes unmanageable. And the solution is the phased-in uniform and standardized requirement of equal access and equal interconnection among all carriers offering service to the public. This solution is also the most efficient.³¹

GSA recommends that the Commission act now to establish the framework for a seamless "network of networks" to serve the public in coming years. The Commission should require all CMRS providers to interconnect with each other pursuant to tariff.

V. The Commission Should Prohibit
Restrictions On The Resale of CMRS.

In its Comments, GSA supported the prohibition of restrictions on resale service in general, and on CMRS in particular.³² GSA emphasized that the establishment of resale obligations will allow new entrants to offer services to the public more quickly because they can resell services while building their own facilities.

Most parties supported the prohibition of restrictions on resale.³³ LDDS stated its position as follows:

LDDS firmly believes that strong requirements regarding resale of wireless service are a crucial complement to wireless equal access rules. The obligation to permit unlimited resale is a fundamental duty of a common

³¹Comments of DCR, pp. 8-9.

³²Comments of GSA, p. 7.

³³See, e.g., Comments of the National Cellular Resellers Association ("NCRA"), pp. 20-21; SNET Mobility, Inc. ("SNET"), p. 15; Bell Atlantic, pp. 15-18.

carrier. The public would be harmed by any action that had the effect of excusing wireless firms from that obligation.³⁴

CTIA adds that the imposition of resale obligations is also necessary for regulatory parity. CTIA states:

Consistent with Congressional intent, the Commission, in its continued adherence to Section 332, must ensure that similar services are treated alike. Imposing resale obligations on CMRS providers to the same extent as cellular carriers is a critical step in fulfilling this objective.³⁵

GSA urges the Commission to prohibit restrictions on the resale of CMRS.

³⁴Comments of LDDS Communications, Inc. ("LDDS"), p. 21.

³⁵Comments of CTIA, p. 35.


IV. Conclusion


As the agency vested with the responsibility for acquiring telecommunications services for use of the Federal Executive Agencies, GSA urges the Commission to impose equal access obligations upon CMRS providers; require LECs to provide interconnection arrangements to CMRS providers under tariff; require CMRS providers to interconnect with each other pursuant to tariffs; and prohibit restrictions on the resale of CMRS.

Respectfully submitted,

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October 13, 1994

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I, Tenley A. Carp, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 13th day of October, 1994, by hand delivery or postage paid to the following parties:

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